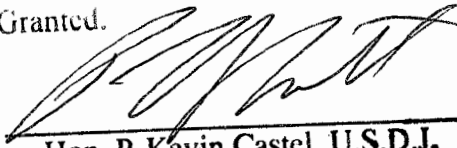


UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
NEW YORK REGIONAL OFFICE
BROOKFIELD PLACE
200 VESEY STREET, ROOM 400
NEW YORK, NY 10281-1022

February 4, 2020

Application Granted.

So Ordered:



Hon. P. Kevin Castel, U.S.D.J.

2-4-20

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: SEC v. Telegram Group Inc. & TON Foundation Inc., No. 19 Civ. 9439 (PKC)

Dear Judge Castel:

Plaintiff Securities and Exchange Commission (the "SEC") respectfully submits this letter to request the Court's permission to re-file certain attachments to Docket Entry ("D.E.") 124 to redact certain additional information that could potentially identify investors in the Telegram offering. On January 31, 2020, the SEC filed D.E. 124, the Declaration of Kevin P. McGrath in Support of Plaintiff's Motion to Strike Telegram's First Affirmative Defense, and Exhibits A to M thereto.¹ The SEC has endeavored to redact information identifying investors pending the Court's ruling on whether this information may be redacted. We subsequently came to learn that Exhibits G, M, and N each contained one reference to an investor that we had inadvertently overlooked. 

Accordingly, the SEC respectfully requests that the Court direct the Clerk's Office to place D.E. 124-7, 124-13, and 124-14 under seal, and that the SEC be permitted to substitute those exhibits with versions identical except for the additional redactions of the investor information described above. We apologize for any inconvenience this may cause the Court or the Clerk's Office.

Respectfully submitted,

/s Ladan F. Stewart
Ladan F. Stewart

cc: Alexander Drylewski, Esq.
Counsel for Defendants

¹ D.E. 124 was a refiled version of D.E. 77 (see SEC's letter dated January 28, 2020).